

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROTHSCHILD CONNECTED DEVICES §
INNOVATIONS, LLC §

Plaintiff, §

vs. §

TING, INC. §

Defendant. §
_____ §

Case No: 2:15-cv-01645-JRG-RSP

LEAD CASE

UNOPPOSED MOTION TO DISMISS TING, INC. WITHOUT PREJUDICE

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff Rothschild Connected Devices Innovations, LLC (“Rothschild”) files this Unopposed Motion to Dismiss Defendant Ting, Inc. Without Prejudice. In support of its Motion, Plaintiff states that neither party has filed an answer or a motion for summary judgment.

Wherefore, Rothschild moves this Court to dismiss this action and all claims by Rothschild against Ting, Inc., without prejudice, with each party to bear its own costs, attorney’s fees and other litigation expenses and request that the Court enter the proposed order of dismissal submitted herewith.

Dated: January 11, 2016

Respectfully submitted,

/s/ Jay Johnson

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CERTIFICATE OF CONFERENCE

The undersigned certifies that on January 11, 2016, counsel for Plaintiff met and conferred with counsel for Defendant and that counsel for Defendant agreed to the motion.

/s/ Jay Johnson

Jay Johnson

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 11, 2016.

/s/ Jay Johnson

Jay Johnson